



2211 8th Ave NE
Suite 1101
Aberdeen, SD 57401

605.725.1000
888.919.8945
605.725.1050 fax

March 6, 2014

Via Electronic Comment Filing System

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-90 –Expression of Interest in Conducting Rural Broadband Experiment

Dear Ms. Dortch:

Enclosed for electronic filing via the Electronic Comment Filing System ("ECFS") in compliance with Federal Communications ("FCC") Order, FCC 14-5, is the attached non-binding Expression of Interest ("EOI") for Northern Valley Communications, LLC ("NVC") regarding the Connect America Phase II network experiments. NVC appreciates the opportunity to file the non-binding EOI.

If you have any questions or concerns on the attached EOI, please contact me.

Respectfully Submitted,

A handwritten signature in black ink that reads 'James Groft'.

James Groft
CEO
jgroft@nvc.net
(605) 725-1000

Attachments (Non-binding EOI)

Non-Binding Expression of Interest – Phase II Rural Broadband Experiment

Northern Valley Communications, LLC ("NVC") submits this Expression of Interest ("EOI") for Connect America Phase II Rural Broadband Experiments per Federal Communications Commission ("FCC") Order, FCC 14-5. This is Stage 1 of the FCC's Phase II experiment proposals and NVC anxiously awaits release of the Stage 2 formal proposal requirements.

Background

NVC has a proven success rate of deploying rural high-speed last mile broadband networks and voice service. NVC has been in the telecommunications industry for seventeen years deploying high quality voice and broadband services. As a solely-owned subsidiary of James Valley Telecommunications of Groton, South Dakota, NVC has extensive experience with building, maintaining, and upgrading an extensive rural voice and broadband network. As a competitive local exchange carrier based in Aberdeen, South Dakota and operating in the surrounding areas, NVC has Eligible Telecommunication Carrier ("ETC") status and CLEC authority in the following exchange areas: Aberdeen and Redfield, South Dakota. NVC has been and currently is a recipient of Universal Service Funding and has extensive experience with the requirements of filing required reports and maintaining support.

Proposed Service Area

Completion of the proposed project would represent an edge out of NVC's current operations. The proposed project includes areas identified by the FCC as unserved in the following census tract numbers in Brown, Edmunds, Faulk, and Spink counties in South Dakota: 46013951400, 46013951700, 46013951800, 46013951900, 46013952000, 46045962100, 46049961100, 46115000100, 46115000200, and 46115000300.

Once completed, the proposed project is estimated to provide broadband and voice access to a total of 1,390 eligible high cost to serve locations based on the Federal Communication Commissions ("FCC") Public Notice, DA 14-154, report dated February 5, 2014 for price cap areas. Of these locations, 516 are extremely high cost to serve locations.

NVC has had contact with a variety of Community Anchor Institutions, local agencies and business interests that have needs supported by the proposed broadband project.

Broadband Technology

NVC anticipates utilizing a combination of 4G LTE and Fiber to the Premises (FTTP) for the proposed project area in order to build a high-speed broadband network. This architecture would provide a robust, broadband networking solution that offers the flexibility to meet the customer demand. The deployed technology will enable NVC to offer a variety of communications and entertainment services, including high-speed Internet access, carrier-class telephony, digital multimedia, Voice over Internet Protocol (VoIP), and interactive, two-way broadband services.

Service Offerings

The service offerings anticipated by NVC are high-speed broadband service and voice service. NVC currently offers these services in adjacent geographic areas. Pricing, speed tiers, and other service details can be found at www.nvc.net.

NVC estimates the proposed project to be completed within 18 to 24 months of award.

Funding

NVC will determine the total cost of the proposed project once the final list of eligible unserved high cost census blocks is identified. Based on the preliminary list of eligible unserved census blocks as well as NVC's experience with building broadband networks, NVC expects to complete the project within the funding constraints proposed for CAF Phase II. NVC expects to request a portion of the funding up front and the remainder over a period of ten years. The funding request is due to the high cost of building a robust, scalable, high-speed broadband and voice network in rural South Dakota. Once the final rules and budget for the Rural CAF Experiment are released by the FCC, NVC will better define the project and applicable costs should a formal proposal be submitted.

Conclusion

NVC appreciates the opportunity that the FCC is providing by allowing rural competitive local exchange carriers to submit an Expression of Interest for the Rural CAF Experiment. NVC was founded to bring state-of-art telecommunications, Internet and video services to the Aberdeen and Redfield phone exchanges and to return quality local customer service to this area. As stated above, NVC is considering a 4G LTE/FTTH network build within ten census tracts that are located in four nearby counties in South Dakota. By funding the proposed project, NVC can reach out to neighboring areas that lack access to high-speed broadband capabilities in rural South Dakota. The NVC proposed broadband network would provide the residents, businesses, and CAI's with a high-speed, robust, and scalable broadband networking solution that offers virtually unlimited bandwidth to areas that have been lacking service. By offering advanced technologies through local customer service, NVC seeks to enhance economic development in our trade area, add to the quality of life of our customers and keep customers connected to an ever-increasing global community.

NVC has already been in conversations with CAIs, local agencies, and businesses within the proposed project service area. NVC is committed to providing a solution to the challenges the residents and businesses have with the current lack of high quality and dependable high speed broadband. It is estimated that approximately 1,400 locations would be able to gain high speed broadband access upon the completion of the build.

NVC is an experienced, dedicated, and committed telecommunications provider. The experienced staff is extremely knowledgeable and holds the resources to complete the proposed project and deliver advanced services to each person who lives and works within the proposed service area. The proposed project cannot be completed without FCC funding. Thank you for taking this proposed project into consideration as the final rules and budget are set for the available experiments.